

From: [Nolan, Michelle](#)
To: [Pelz, Oliver \(O\)](#); [Deford, Connie \(C\)](#)
Cc: [Hospital, Jocelyn](#); [Costello, Kevin](#); [Perry, Tracy](#); [Brooks, Karen \(K\)](#)
Subject: RE: National Marine Fisheries Services (NMFS) Biological Opinion on 1,3-D
Date: Thursday, July 22, 2021 1:13:00 PM

Hi Oliver,

I look forward to working with you as well!

We are unable to extend the 60-day deadline to submit amended labels with the language required by NMFS' BiOp for 1,3-D. Per the BiOp, technical labels need to be submitted to EPA within 60-days of issuance of the BiOp (**by Aug. 30**) and end-use labels need to be submitted within 60-days of EPA's notification (**by Sept. 10**). Once the 1,3-D Interim Registration Review Decision is issued, anticipated this fall, we will reach out to discuss the best way to coordinate the BiOp changes and the upcoming ID changes.

Please let me know if you have any further questions.

Best,
Michelle

From: Pelz, Oliver (O) <OPelz@dow.com>
Sent: Tuesday, July 20, 2021 7:36 PM
To: Nolan, Michelle <nolan.michelle@epa.gov>; Deford, Connie (C) <CDeford@dow.com>
Cc: Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Perry, Tracy <Perry.Tracy@epa.gov>; Brooks, Karen (K) <kbrooks5@dow.com>
Subject: RE: National Marine Fisheries Services (NMFS) Biological Opinion on 1,3-D

Hi Michelle,

As Connie shared with you last week, I am assuming her role as Global Regulatory Lead for 1,3-Dichloropropene (1,3-D) for Salt Lake Holding and look forward to working with you and your colleagues.

In follow up to your email below, we do understand from the BiOp that our updated labels for products containing 1,3-D must be submitted by Sept. 10, 2021. While these additions are not difficult to make, given that we are expecting the Final Interim Registration Review Decision (IRRD) (with additional required label changes) anytime, we are concerned about the confusion that could occur in the market due to multiple label changes in a short period of time. It would be ideal for the market if we could implement all of these label changes at the same time.

Can you provide an update as to when we might expect the Final IRRD?

Given that we expect the label changes coming out of the IRRD to be more involved than the BiOp

label additions, we would expect to need more than 60 days to provide a draft to the Agency. Is it possible for the Agency to make any adjustments to the deadline for the label additions related to the 1,3-D BiOp?

Thank you for considering this.

Regards,
Oliver Pelz

General Business

From: Nolan, Michelle <nolan.michelle@epa.gov>
Sent: Tuesday, July 13, 2021 6:54 AM
To: Deford, Connie (C) <CDeford@dow.com>; Pelz, Oliver (O) <OPelz@dow.com>
Cc: Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Perry, Tracy <Perry.Tracy@epa.gov>
Subject: RE: National Marine Fisheries Services (NMFS) Biological Opinion on 1,3-D

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Hi Connie,

Thank you for letting me know. Congratulations on your retirement!

Oliver,

I look forward to working with you on this chemical case.

Best,
Michelle

From: Deford, Connie (C) <CDeford@dow.com>
Sent: Monday, July 12, 2021 6:52 PM
To: Nolan, Michelle <nolan.michelle@epa.gov>; Pelz, Oliver (O) <OPelz@dow.com>
Cc: Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Perry, Tracy <Perry.Tracy@epa.gov>
Subject: RE: National Marine Fisheries Services (NMFS) Biological Opinion on 1,3-D

Michelle: Thank you for this information. I did want to let you know that I'm retiring and Oliver Pelz (opelz@dow.com) will be assuming my role as the Global Regulatory Lead for 1,3-Dichloropropene. We have submitted a formal communication to Kimberly Smith but wanted you to be aware for future communications. I appreciated the opportunity to work with you.

Regards,

Connie Deford
cdeford@dow.com

General Business

From: Nolan, Michelle <nolan.michelle@epa.gov>
Sent: Monday, July 12, 2021 4:54 PM
To: Deford, Connie (C) <CDeford@dow.com>
Cc: Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Perry, Tracy <Perry.Tracy@epa.gov>
Subject: National Marine Fisheries Services (NMFS) Biological Opinion on 1,3-D

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Although you may have already received the Biological Opinion, attached you'll find a letter regarding the National Marine Fisheries Service (NMFS) Biological Opinion on 1,3-D.

You are receiving this letter because your company holds registrations for 1,3-D products. Labels must be amended to be consistent with the NMFS Biological Opinion regarding the effects on 28 federally-listed endangered and threatened species of Pacific salmon and steelhead in Washington, Oregon and California.

Your 1,3-D product labels must be amended and submitted to the Agency for review on or before September 10, 2021 which is 60 days from the receipt of this letter. The Biological Opinion for 1,3-D may be found on NMFS' website at: <https://doi.org/10.25923/k6gr-r790>.

Please let me know if you have any questions.

Best,

Michelle Nolan
Chemical Review Manager
US Environmental Protection Agency
OSCPP/OPP/PRD/RMIBII
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Nolan.michelle@epa.gov